



Pharmacy Health Information Technology Collaborative

Via Electronic Submission to: <https://www.healthit.gov/standards-advisory/2016>

November 6, 2016

Office of the National Coordinator
Department of Health and Human Services
Hubert H. Humphrey Bldg., Suite 729D
200 Independence Ave., SW
Washington, DC 20201

Re: 2016 Interoperability Standards Advisory

Dear Sir or Madam:

On behalf of the membership of the Pharmacy Health Information Technology Collaborative (Collaborative), we are pleased to submit comments regarding the proposed *2016 Interoperability Standards Advisory*.

The Collaborative has been involved with the federal agencies, including the Office of the National Coordinator (ONC), developing the national health information technology (HIT) framework since 2010. The Collaborative is supportive of the proposed standards for clinical health IT interoperability purposes.

Pharmacists provide patient-centered care and services, maintain various secure patient care records, and as part of the integrated health care team, they are directly involved with other health care providers and patients in various practice settings. Pharmacists are users of health IT and are especially supportive of interoperability standards incorporating HL7, SNOMED CT, LOINC, RxNorm, and NCPDP SCRIPT, and NCPDP Real Time Formulary and Benefits (currently under development). The Collaborative supports use of these particular standards which are important to pharmacists for allergy reactions, immunization historical and administered, immunization registry reporting, medications, medication allergies, patient problems, smoking status, reporting to public health agencies, clinical decision support services/knowledge artifacts, drug formulary checking, and electronic prescribing (including new versions).

As noted in our attached comments on the Interoperability Standards Advisory tables, it is vitally important that pharmacists' access to the proposed interoperability elements not be limited. Pharmacists, as health care providers need the ability to query documents within/outside a specific health information exchange domain and clinical health information, as well as medication and immunization sharing. Pharmacists need to know the indications on medications relating to ICD-10 and SNOMED-CT.

The following are our comments regarding two of the additional requests for feedback posed for the proposed *2016 Interoperability Standards Advisory*.

Pharmacy Health Information Technology Collaborative

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General

Request 4-1: *Please provide feedback on whether revision from “purpose” to “interoperability need” provides the additional requested context and suggestions for how to continue to improve this portion.*

The Collaborative supports the revisions from “purpose” to “interoperability need.”

Section I: Vocabulary/Code Set/

Request 4-5: *Based on public feedback and HIT Standards Committee review, there does not appear to be a best available standard for several “interoperability needs” expressed in this section of the draft Advisory. Please provide feedback on whether this is correct or recommend a standard.*

The Collaborative supports the value sets of SNOMED-CT, RxNorm, and LOINC. Additional information regarding value sets for these three may be found at https://www.nlm.nih.gov/healthit/meaningful_use.html.

The Pharmacy HIT Collaborative’s vision and mission are to assure the nation’s health care system is supported by meaningful use of HIT, the integration of pharmacists for the provision of quality patient care, and to advocate and educate key stakeholders regarding the meaningful use of HIT and the inclusion of pharmacists within a technology-enabled integrated health care system. The Collaborative was formed in the fall of 2010 by nine pharmacy professional associations, representing 250,000 members, and also includes associate members from other pharmacy-related organizations. The Pharmacy HIT Collaborative’s founding organizations represent pharmacists in all patient care settings and other facets of pharmacy, including pharmacy education and pharmacy education accreditation. The Collaborative’s Associate Members represent e-prescribing and health information networks, a standards development organization, transaction processing networks, pharmacy companies, system vendors and other organizations that support pharmacists’ services. For additional information, visit www.pharmacyhit.org

On behalf of the Pharmacy HIT Collaborative, thank you again for the opportunity to comment on the *2016 Interoperability Standards Advisory*).

For more information, contact Shelly Spiro, Executive Director, Pharmacy HIT Collaborative, at shelly@pharmacyhit.org.

Respectfully submitted,



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